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**MEMO ENDORSED**

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January 10, 2025

**VIA ECF**

The Honorable Jessica G. L. Clarke  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 11B  
New York, New York 10007

Re: *Doe v. Black*, Case No. 1:23-cv-06418-JGLC

Dear Judge Clarke:

I represent Defendant Leon Black in the above-referenced matter. I write to respectfully request that the Court immediately seal ECF No. 189, a letter submitted by Jane Doe's counsel yesterday that contains sensitive personal and identifying information, until the parties meet and confer as to proposed redactions.

The attachments to ECF No. 189 contain the cell phone numbers and home addresses of several non-party individuals. *See* ECF No. 189-1 at 2-6; ECF No. 189-2 at 2-5. The publication of this personal identifying information violates Local Rule 5.2 and this Court's Individual Rules. *See* 2013 Committee Note to Local Rule 5.2 (“[B]efore filing a letter via ECF, parties should consider whether the letter contains . . . personal information . . . that should not be in the public file, in which case the letter should be sent directly to chambers instead of via ECF.”); Individual Rule 5(a) (“The parties should not include, unless necessary, the five categories of ‘sensitive information’ in their submissions (i.e., social security numbers, names of minor children [use the initials only], dates of birth [use the year only], financial account numbers and home addresses [use only the City and State]).”); Individual Rule 5(b) (“Without Court approval, parties may redact the five categories of ‘sensitive information’ and the six categories of information requiring caution (i.e., personal identifying number . . .), as described in the Privacy Policy.”).

The references to personal phone numbers and home addresses should accordingly be redacted and the letter should be sealed in its entirety until a corrected, redacted version is filed. *See Robinson v. De Niro*, 2023 WL 3728350, at \*1 (S.D.N.Y. May 26, 2023) (granting motion to redact personal information such as home addresses and phone numbers).

**quinn emanuel urquhart & sullivan, llp**

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Respectfully submitted,

/s/ Michael B. Carlinsky  
Michael B. Carlinsky

Cc: All Counsel

Application GRANTED. The parties are to meet and confer and propose redactions to ECF Nos. 189-1 and 189-2 by **January 15, 2025**. Access shall be restricted to attorneys appearing for the parties and court personnel in the interim. Plaintiff is further reminded to comply with Local Rules and this Court's Individual Rules and Practices, particularly where sensitive information may be inadvertently disclosed. The Clerk of Court is respectfully directed to terminate ECF No. 191, and to place ECF Nos. 189-1 and 189-2 under seal.

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke". The signature is written in a cursive, flowing style.

JESSICA G. L. CLARKE  
United States District Judge

Dated: January 13, 2025  
New York, New York